

Supplier Code of Conduct

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OWNER: Chief Procurement Officer



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1. Introduction by the CEO



Martin Lippert, Group CEO

GlobalConnect is a leading provider of critical digital infrastructure in Northern Europe, and we experience first-hand how connectivity empowers society. With more than 50 pct of all data traffic in the region, being on our infrastructure, means that we have a very large responsibility in keeping society up and running. Something we work on every day to uphold. Moreover, while the need for digitalization is increasing and critical digital infrastructure is expanding the environmental footprint of our industry is increasing as well.

It is our responsibility to explore innovative solutions and to ensure a responsible value chain that contributes to limiting our negative carbon footprint and social impact. We believe that in partnership with our suppliers we can create great value for both parties. Not only because our many stakeholders expect us to, but because we believe it is the right thing to do.

2. Foundation

GlobalConnect continuously strive to maintain high ethical standards in our work, and we therefore expect the same high standards from our Suppliers. As a chain is never stronger than its weakest link, we, together with our Suppliers wish to ensure growth and success in the world in a sound manner. This Supplier Code of Conduct (“the Code”), describes GlobalConnect’s ethical standards, values, and what responsible business conduct is to us, as well as expectations on lawful and sustainable business practices in our Suppliers’ operations.

Our commitment to responsible development is grounded in international standards, including OECD guidelines for Multinational Enterprises (MNEs) and the Ten Principles of the United Nations Global Compact. These principles are based on internationally recognized declarations and conventions such as the Universal Declaration of Human Rights, the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention Against Corruption.

The high standards we apply to our own business also apply to our Suppliers, including contractors, consultants, agents, and other business partners globally and across all markets in which we operate. We see our Suppliers as an extension of GlobalConnect. Therefore, when this Code uses “GlobalConnect,” “we,” or “our,” it includes Suppliers acting on our behalf.

This Code will be reviewed and updated regularly to ensure alignment with evolving laws, regulations, and market expectations.

3. General requirements

3.1. Responsibilities

We expect all Suppliers to understand and comply with Global Connects Supplier Code of Conduct and to ensure that it is implemented in their supply chain. **We reserve the right to make requests for**

information to our Suppliers, to substantiate their compliance with the Code. Upon receiving reasonable notice, the Supplier should either give us access to relevant premises or documentation to verify compliance with the Code.

If a Supplier fails to meet the terms of the Code, GlobalConnect's approach is to allow appropriate corrective actions within a reasonable time. GlobalConnect reserve the right to request information on those actions and their progress. Critical breaches or repeated unwillingness to comply may lead to termination of the business relationship for convenience.

This Code also applies to the Supplier's supply chain and potential sub-suppliers. Suppliers must exercise reasonable control and make their best efforts to ensure equivalent standards are upheld.

3.2. Compliance with Laws, Regulations and the Code

Suppliers must comply with all laws and regulations applicable to their services and products in the jurisdictions in which they operate including conventions and guidelines set by international organisations such as the UN, ILO and the OECD, as well as the requirements in this Code.

If the Code sets higher standards than applicable laws or regulations, compliance with the Code remains mandatory. Where its requirements conflict with laws, regulations, or international standards, Suppliers are expected to inform GlobalConnect so that the most appropriate course of action can be determined together.

3.3. Reporting compliance concerns

Suppliers must report any breach of the Code or other compliance concerns to GlobalConnect without undue delay. Contact information is available on our websites, or Suppliers may reach out to their GlobalConnect contact person. Retaliation against anyone who reports a suspected violation in good faith is not tolerated. Suspected misconduct by GlobalConnect or its employees should also be reported.

4. Specific requirements

4.1. Human rights and labour rights

Suppliers must respect human rights and labour rights, as described in the international applicable human- and labour rights conventions stated in section 2, which deal with the basic principles and rights in the performance of work. This includes protecting and promoting the rights of own employees and ensuring no human or labour rights violations amongst own Suppliers.

4.2. Child labour

Suppliers must not employ, engage in, benefit from or use a child as a workforce if it is under the age of 15 or a higher age prescribed by applicable laws, in which case the higher age shall apply. Exceptions can only be made for work acceptable under the ILO Minimum Age Convention (C138). Under no circumstances shall Suppliers let a child under the age of eighteen (18) perform hazardous work.

4.3. Labour conditions and forced labour

Suppliers must ensure no use of forced labour, slavery, human trafficking or bonded labour in any parts of their value chain. Suppliers must not restrict employees in moving freely or leave premises after working hours. Suppliers may not require employees to lodge identity papers or deposits (financial or otherwise) as a condition for their employment.

4.4. Non-discrimination and equal treatment

Suppliers must commit to treating all employees as well as job applicants equally and fairly in all situations. Suppliers must also base recruitment, dismissal, transfer, promotion, determination of salary, setting of working conditions or competence development on relevant and objective criteria. Suppliers must have zero tolerance for discrimination on the basis of gender, religion, ethnicity, disabilities, sexual orientation, social status, marital status, age, political belief or other irrelevant reasons.

4.5. Freedom of association and the right to collective agreements

Suppliers must, subject to local laws, respect the rights of their employees and other workers to form, join (or refrain from joining) trade unions, bargain collectively or otherwise have the opportunity to affect their working conditions. If the right to freedom of association and collective bargaining is restricted by laws or regulations, Suppliers must allow alternative forms of worker representation.

4.6. Responsible sourcing of minerals

Suppliers responsible for supplying products containing tin, tantalum, tungsten, gold, collectively known as Conflict Minerals or 3TG metals, and cobalt, must adhere to GlobalConnect's commitment to human rights. As part of this agenda, suppliers are expected to follow the latest OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Suppliers are expected to establish written policies and procedures regarding the acquisition of Conflict Minerals, ensuring verifiable steps are taken to exclude these minerals from supplied products.

4.7. Health & Safety

Suppliers must provide safe working conditions based on basic health and safety standards in the country of operations. Suppliers must also ensure proper safety measures have been introduced in relation to the employee's performance of work in the company to minimize the risk of work-related injuries. We expect our Suppliers always to comply with all relevant local laws and regulations regarding health and safety at work, with the aim of preventing accidents and employee injury.

4.8. Recruitment practice, salary and working hours

Suppliers must provide all employees with a written employment contract containing the terms of employment in an easy-to-understand language. Employees must be able to terminate the agreement within a reasonable timeframe.

Suppliers must provide their workforce with remuneration, salary and benefits that meet any national legal standard on minimum wage, overtime and sick leave, and provides for a living wage. A living wage is understood as remuneration sufficient to afford a decent standard of living for the worker and the worker's family. Suppliers must not use wage deductions as disciplinary measures.

Suppliers must comply with local rules for maximum working hours and that employees are entitled to rest breaks and freedom in accordance with local laws.

4.9. Protecting the environment

Suppliers must comply with relevant local and national environmental regulations and maintain relevant licenses, registrations and permissions required for the work's performance.

Suppliers must focus on reducing negative environmental impacts by, for example, controlling harmful spillages and waste and ensuring environmentally safe disposal. We expect our Suppliers to strive to protect the environment, promote sustainable and efficient use of natural resources, and protect biodiversity.

4.9.1 Climate change mitigation

Suppliers must act in identifying, addressing and mitigating greenhouse gas (GHG) emissions by actively monitoring and measuring GHG emissions across scope 1 & 2 and to the extent possible scope 3 calculated in line with the GHG Protocol. This data should be made available to GlobalConnect upon request. Likewise, Suppliers must have in place a climate transition plan and a plan to reduce energy consumption to reduce negative impact on the climate.

Suppliers are expected to set science-based targets or alike to reduce its emissions in line with the Paris Agreement and have them validated by the Science Based Targets initiative or a similar ambitious third party.

4.9.2 Circularity and waste management

Suppliers are expected to proactively explore circular approaches in terms of products and services looking at it from a holistic, lifecycle perspective, including use of materials and energy usage all the way from design phase to end-of-life treatment.

We expect Suppliers to conduct an assessment of their resource use to ensure the least environmentally harmful solution. Suppliers must work to minimize waste in their operations and supply chain. For Suppliers managing 'electrical and electronic equipment' (EEE) expect Suppliers to adhere to EU regulation, Waste from Electrical and Electronic Equipment (WEEE) and to control and manage harmful waste.

4.9.3 Water and pollution

We expect that Suppliers will control water usage and ensure no harmful, toxic effluents and spillages. We expect all Suppliers will be mindful of minimizing potential air, water and soil pollutants/contaminants.

4.9.4 Biodiversity

We expect Suppliers that are having a direct impact or dependency on biodiversity to put in place a plan on how to minimize the impact on vital ecosystems.

4.10. Anti-corruption and Bribery

Suppliers must conduct their business ethically and lawfully. Corruption, in any form, is prohibited. This includes among other things bribery, kickbacks and facilitation payments. Suppliers must not accept¹ or

¹ Example of accepting a bribe: A supplier offers a family member of an employee in a company a job, but makes it clear that in return, the employee is expected to use his/her influence to ensure that the company continues to do business with the supplier.

offer² bribes of any kind. Bribery includes offering or accepting an improper gift, benefit or promise of this with the intention of influencing the performance of duties. This can include gifts, loans, discounts, or other advantages exchanged between anyone associated with GlobalConnect and external parties.

Kickbacks³, a specific type of bribery, involve payments or anything of value offered in exchange for preferential treatment or any other improper services. Such practices are forbidden and are not to be confused with legitimate bonus programs to reward performance of specific business goals (also referred to as kickbacks).

Facilitation payments,⁴ which are unofficial payments made to expedite routine actions to which the payer is entitled, are also prohibited. These payments may be small amounts demanded by service providers or offered to officials to speed up services or permits.

4.11. Gifts and hospitality

Business courtesies such as gifts, hospitality and travel may be considered bribery in certain circumstances. A bribe may take many forms such as seminars, social events, entertainment, accommodations or sponsorships.

Suppliers must always be careful when offering gifts and complimentary tokens of acknowledgement to GlobalConnect's employees. Suppliers must not offer gifts if they can reasonably be deemed to influence business-related decisions. Any offered hospitality to GlobalConnect's employees should have a legitimate business purpose involved and the cost related should be within reasonable limits.

Suppliers must not offer any gifts or hospitality to any third party, in order to obtain or retain business or a business advantage for GlobalConnect.

4.12. Contributions to political parties

If acting as a representative of GlobalConnect, Suppliers are not allowed to engage in any political activities or support political parties, election campaigns or similar on behalf of GlobalConnect.

4.13. Anti-money laundering and Counter-terrorist financing (AML)

Suppliers must not be used for money laundering or terrorist financing purposes. Suppliers must ensure that its business practices and its sub-suppliers follow all applicable AML laws and regulations.

² Example of offering a bribe: An employee offering to pay for a hotel stay of a potential customer/partner, but only if he/she agrees to do business with the company of the employee.

³ Example of kickback: An employee in charge of a tender might receive a kickback for choosing one supplier over another. This may result in a better-qualified supplier not winning the contract. Paying kickbacks is also unlawful if the company paying such kickbacks submits the best bid and would have won the tender regardless of the kickback. The kickback may be money, a gift, travel or anything other of value.

⁴ Example of facilitation payments: An employee needs a permit from the authorities. The issuance of the permit usually takes three weeks. The employee offers the public official handling the permits a small amount of money to issue the permit in one day. By doing so, the employee makes the person speed up the issuance process.

4.14. Sanctions

Suppliers must take reasonable action to ensure that no entity or person subject to United Nations, European Union or other applicable sanctions laws and regulations is involved in or unlawfully benefits from the Supplier's operations, including its supply chain.

4.15. Conflict of interest

Suppliers must strive to avoid conflicts of interest or situations giving the appearance of a potential conflict of interest in its dealings with GlobalConnect. If there are any situations of actual or potential conflict of interest between the personal interests of those involved and the interests of GlobalConnect, Suppliers are expected to report this to GlobalConnect.

4.16. Fair competition

Suppliers must respect and comply with all laws and regulations designed to promote fair and healthy competition and not enter into discussions or agreements with competitors concerning pricing, market sharing, or similar activities.

4.17. Confidential material, information and cybersecurity

Suppliers must implement and maintain measures to safeguard the confidentiality, integrity and availability of information and assets belonging to GlobalConnect and our business partners in accordance with relevant security standards, regulations and best practices. Suppliers are not allowed to disclose any confidential or proprietary information⁵ received during or after their collaboration with GlobalConnect to any external parties, unless authorised in writing by GlobalConnect or if required by law.

4.18. Data Privacy

Globalconnect collects personal data about our Suppliers, including contact details about contact persons. GlobalConnect processes all personal data according to the EU General Data Protection Regulation (GDPR) and Suppliers are expected to adhere to GDPR as well.

4.19. Loyal conduct

Suppliers are expected to loyally support and consider the impact of our brand and avoid any damaging or derogatory communication, whether online or elsewhere. The following activities are not permitted: 1) Publication of defamatory and or knowingly false material about GlobalConnect, its employees and or customers or Suppliers on social networking sites or in any other online publishing format, 2) Messages or other content containing statements on any subject that could be mistakenly interpreted as the standpoint of GlobalConnect.

⁵ Confidential information may include, but is not limited to, trade secrets, financial data, intellectual property and information of sensitive nature.